



Comcast Corporation
300 New Jersey Avenue, NW
Suite 700
Washington, DC 20001

June 16, 2011

EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: WC Docket Nos. 10-90, 07-135, 05-337; GN Docket No. 09-51; CC Docket 01-92

Dear Ms. Dortch:

On June 15, 2011, Andrew Fisher and Beth Choroser of Comcast Cable Communications, Michael Pelcovits of MiCRA, Inc. and the undersigned met with Al Lewis, Marcus Maher, John Hunter, Lynne Engledow, and Victoria Goldberg of the Pricing Policy Division of the Wireline Competition Bureau.

We discussed Comcast's views on the Commission's *Notice of Proposed Rulemaking* in the above-referenced proceedings, in particular the Commission's proposals for long-term intercarrier compensation reform and for the appropriate short-term compensation treatment for voice over IP (VoIP) traffic. Our discussions repeated arguments made in Comcast's comments and reply comments.¹

We expressed Comcast's support for the Commission's efforts to fashion a coherent system that accelerates the deployment of IP-based broadband networks and argued that Comcast's proposal for the treatment of IP-originated traffic would advance the Commission's goal while setting the rates at more economically efficient levels than current access charges. We argued in support of a three-year transition for reforming intercarrier compensation that will set the default compensation rate for all terminating voice traffic equal to the applicable reciprocal compensation rate. We encouraged the Commission to rely on explicit subsidies from the Connect America Fund for those carriers that need additional revenues to support broadband investment in unserved areas, rather than implicit intercarrier compensation subsidies that distort the market. We also expressed our support for the Commission's goal to contain the overall size of the Universal Service Fund. Finally, we expressed our support for the Commission's proposals to address traffic pumping, consistent with our filings.²

Sincerely,

/s/ Mary McManus

Mary McManus

¹ See Comcast Comments, filed Apr. 1, 2011, at 3-8; Comcast Comments, filed Apr. 18, 2011, at 2-10; Comcast Reply Comments, filed Apr. 18, 2011, at 8-12.

² See Comcast Comments, filed Apr. 1, 2011, at 10-11; Comcast Reply Comments, filed Apr. 1, 2011, at 5-8.